

Exhibit P-12

ELIZABETH HERNANDEZ vs ROB KOLKMAN
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1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF UTAH CENTRAL DIVISION

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* CERTIFIED COPY

5 ELIZABETH HERNANDEZ,

6 Plaintiff,

* Case Number: 2:23-cv-00772

7 v.

* Judge: Jill N. Parrish

8 ROB KOLKMAN, CONSTABLE KOLKMAN
LLC, and JOHN DOES 1-5,

* Magistrate Judge:

* Daphne A. Oberg

9 Defendants.

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13 DEPOSITION OF

14 Rob Kolkman

15 April 22, 2024

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18 CONTAINS CONFIDENTIAL TESTIMONY

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Reported by: Spencer Von Jarrett, RPR No. 993793

ELIZABETH HERNANDEZ vs ROB KOLKMAN
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1	Deposition of Rob Kolkman, taken on April 22, 2024 at 10:00 a.m.	1	P R O C E E D I N G S
2	at the offices of JD Legal Support, 2901 W. Bluegrass Blvd,	2	[On the record at 10:01 a.m.]
3	Suite 200, Lehi, UT 84043, before Spencer Von Jarrett, Certified	3	[Appearances noted.]
4	Court Reporter, in and for the State of Utah.	4	ROB KOLKMAN,
5		5	a witness herein, having been administered an oath,
6	A P P E A R A N C E S	6	was examined and testified as follows.
7	Eric Stephenson (9779)	7	EXAMINATION
8	STEPHENSON LAW FIRM	8	BY MR. STEPHENSON:
9	250 North Redcliffs Drive, 4B #254	9	Q. State your name, please.
10	Saint George, Utah 84790	10	A. You need to speak up. I'm a little hard of hearing and
11	ericstephenson@utahjustice.com	11	there is an echo.
12	Attorney for Plaintiff	12	Q. The echo is driving me crazy already.
13	Christopher Hill	13	A. Okay.
14	KIRTON McCONKIE	14	Q. Can you tell us your name.
15	36 S. State St., Ste. 1900	15	A. Rob Kolkman.
16	Salt Lake City, UT 84111	16	Q. Is that your full true name?
17	CHill@kmclaw.com	17	A. Yes.
18	Attorney for the Defendants	18	Q. Do you have any aliases you go by?
19		19	A. No.
20		20	Q. And what company do you work for?
21		21	A. Constable Kolkman.
22		22	Q. Is that the full title of the company?
23		23	A. Constable Kolkman LLC.
24		24	Q. Okay. Do you own any other companies?
25		25	A. Yes.
	Page 3		Page 5
1	I N D E X	1	Q. What are the names of those companies?
2	WITNESS: Rob Kolkman	2	A. Let's see -- Kolkman Constable Services.
3	EXAMINATION	3	Q. Is that all?
4	By: Mr. Stephenson	4	A. Yeah.
5		5	Q. Okay. And what is your title at Kolkman -- Constable
6		6	Kolkman LLC, is it?
7	E X H I B I T S	7	A. Yeah.
8	NUMBER	8	Q. What's your title there?
9	DESCRIPTION	9	A. Owner.
10		10	Q. And who else owns that with you?
11	C O N F I D E N T I A L	11	A. No one.
12	PAGE LINE	12	Q. So let me talk about depositions and how to do this.
13	18 - 25	13	Have you been deposed before?
14	21 - 10	14	A. No.
15	22 - 1	15	Q. What did you do to prepare for today's deposition?
16	23 - 25	16	A. Looked at some notes.
17	24 - 22	17	Q. What notes did you look at?
18	25 - 19	18	A. The ones that were in my computer.
19	26 - 9	19	Q. What were they specifically?
20	29 - 8	20	MR. HILL: Objection. Vague.
21		21	You can answer to the best of your ability.
22		22	Q. Your answer didn't tell me what the notes were.
23		23	Were they notes taken by you or by somebody else?
24		24	A. They were notes taken by someone else.
25		25	Q. Who took those notes?

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<p>1 MR. HILL: Objection, foundation.</p> <p>2 You can answer.</p> <p>3 A. I believe it was either -- it could have been Andrea and</p> <p>4 Cory.</p> <p>5 Q. Okay. And who is Andrea?</p> <p>6 A. She is an employee.</p> <p>7 Q. What's her last name?</p> <p>8 A. Dobson [phonetic].</p> <p>9 Q. And Cory is Cory Revel [phonetic]?</p> <p>10 A. Correct.</p> <p>11 Q. Okay. And what do those notes tell you?</p> <p>12 A. A rough outline.</p> <p>13 MR. HILL: Objection, vague.</p> <p>14 You can answer.</p> <p>15 A. Just a rough outline of what occurred in any</p> <p>16 conversations.</p> <p>17 Q. And have those notes been produced in discovery?</p> <p>18 A. I don't know.</p> <p>19 Q. Are they handwritten or typed?</p> <p>20 A. Typed.</p> <p>21 Q. Do they have a date of their creation on them?</p> <p>22 A. I believe so.</p> <p>23 Q. Do you know what the date is, what the date is on those?</p> <p>24 A. Right off the top of my head, no.</p> <p>25 Q. How would I identify those notes when I ask for them in</p>	<p>1 A. No, not really.</p> <p>2 Q. When you say not really, is that an absolute no, or is</p> <p>3 that, "They said something but it's not important."?</p> <p>4 A. We'd already had communications back and forth.</p> <p>5 Q. Okay. And those communications were -- what were those</p> <p>6 specific communications: what did they say to you?</p> <p>7 A. What occurred.</p> <p>8 Q. Okay. Basically what was already in the notes?</p> <p>9 A. Yes.</p> <p>10 Q. Did they give you any information that was not in the</p> <p>11 notes?</p> <p>12 A. No.</p> <p>13 Q. Okay. So now, in a deposition you understand that you</p> <p>14 just took an oath to tell the truth and you're under penalty of</p> <p>15 perjury; correct?</p> <p>16 A. Yes.</p> <p>17 Q. And do you understand that includes answering the</p> <p>18 question I asked, not changing the question by answering a</p> <p>19 different question?</p> <p>20 A. Okay.</p> <p>21 Q. And you know that that you can't -- when your oath is to</p> <p>22 tell the truth the whole truth and nothing but the truth, it means</p> <p>23 you don't leave out important details; correct?</p> <p>24 A. Okay.</p> <p>25 Q. And you agree that that your role here is not to argue</p>
Page 7	Page 9
<p>1 later discovery requests; what would I call those notes?</p> <p>2 What do you call those notes?</p> <p>3 A. They're just a timeline of kind of what occurred when we</p> <p>4 had communications.</p> <p>5 Q. Okay. So I'm going to call them the timeline and</p> <p>6 communications notes in case we need to speak about them later.</p> <p>7 Is that fair?</p> <p>8 A. Sure.</p> <p>9 Q. Okay. And then when I request them in discovery, you'll</p> <p>10 know what I'm asking for -- your counsel will.</p> <p>11 Okay. Did you bring a copy of those notes with you</p> <p>12 today?</p> <p>13 A. I did not.</p> <p>14 Q. Now who did you talk to prepare for this case -- this</p> <p>15 deposition, specifically?</p> <p>16 A. My attorney.</p> <p>17 Q. Which attorney?</p> <p>18 A. Chris Hill.</p> <p>19 Q. Did you speak to anyone else?</p> <p>20 A. No.</p> <p>21 Q. Did you talk to Cory or Andrea?</p> <p>22 A. Correction: I did tell them I was being deposed on the</p> <p>23 Hernandez case.</p> <p>24 Q. Did they help you prepare for this deposition by talking</p> <p>25 to you and telling you anything?</p>	<p>1 with me about a question or an answer, it's just to answer the</p> <p>2 questions?</p> <p>3 A. Yes.</p> <p>4 Q. Is there anything right now that you would say is</p> <p>5 hindering your ability to answer questions truthfully honestly and</p> <p>6 fully today?</p> <p>7 A. No.</p> <p>8 Q. Okay. So tell me the name of your company again: it was</p> <p>9 Kolkman LLC; Rob Kolkman LLC?</p> <p>10 A. Constable Kolkman --</p> <p>11 MR. HILL: Objection, asked and answered and misstates</p> <p>12 prior testimony.</p> <p>13 You can answer.</p> <p>14 MR. STEPHENSON: What was I misstating about? He told</p> <p>15 me the name of his company; what was I misstating?</p> <p>16 I want to be sure I get it right.</p> <p>17 MR. HILL: Well, not to get into argument in the course</p> <p>18 of a deposition, but he testified there were two companies and you</p> <p>19 asked the question is if there was a single company. That could</p> <p>20 be misleading.</p> <p>21 MR. STEPHENSON: Okay. That's --</p> <p>22 BY MR. STEPHENSON:</p> <p>23 Q. We're talking about one company here at this point;</p> <p>24 we're talking about Constable Kolkman LLC.</p> <p>25 That's the main company, correct?</p>

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<p style="text-align: right;">Page 10</p> <p>1 A. Correct.</p> <p>2 Q. Okay. And how long have you owned that company?</p> <p>3 A. About a year.</p> <p>4 Q. And what does Constable Kolkman LLC do that's different 5 from your other company?</p> <p>6 MR. HILL: I'm going to object on the grounds that it's 7 beyond the scope of discovery or relevance in this action.</p> <p>8 You can answer.</p> <p>9 A. We mainly focus on writs of execution.</p> <p>10 Q. And the other company focuses on what?</p> <p>11 MR. HILL: Same objection: beyond the scope of 12 discovery.</p> <p>13 You can answer.</p> <p>14 A. Can you -- I didn't hear.</p> <p>15 Q. Yeah. And your other company, what does it do?</p> <p>16 MR. HILL: Same objection.</p> <p>17 Go ahead.</p> <p>18 A. It serves all kinds of legal process including writs of 19 execution.</p> <p>20 Q. Okay. And so Constable Kolkman LLC is specifically 21 targeted, though, at writs of execution only?</p> <p>22 A. Constable Kolkman.</p> <p>23 Q. Constable Kolkman LLC?</p> <p>24 A. Yeah.</p> <p>25 Q. That's just writs of execution?</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. Okay. Other than talking to the employees, observing 2 property, handling the books and payroll, managing daily activity, 3 what else do you do for Constable Kolkman LLC?</p> <p>4 A. That's about it.</p> <p>5 Q. And the other company -- I forgot the name, so would you 6 tell me that again?</p> <p>7 A. Kolkman Constable Services.</p> <p>8 Q. And Kolkman Constable Services: what do you do for that 9 company?</p> <p>10 MR. HILL: Objection. Irrelevant, outside the scope of 11 discovery.</p> <p>12 You can answer.</p> <p>13 MR. STEPHENSON: I'm going to stop you real quick, 14 because that's the third time you've objected for relevancy and 15 it's not a proper objection for a deposition. It's one of those 16 depositions that's reserved, so.</p> <p>17 MR. HILL: I'm going to amend my objection: because it 18 is outside the scope of discovery, it is intended to annoy, 19 harass -- or only intended to annoy/harass the witness which is a 20 proper objection.</p> <p>21 And you can answer the question.</p> <p>22 THE WITNESS: Could you ask the question again?</p> <p>23 BY MR. STEPHENSON:</p> <p>24 Q. Kolkman Constable Services: what do you do for that 25 company?</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Pretty much.</p> <p>2 Q. Okay. And when you say one year, are you approximating 3 that? Or how close to a year are we; is it one year exactly or 4 one year three months?</p> <p>5 A. I think it was January of '23.</p> <p>6 Q. And what is your position at that company; just owner, 7 or do you have another title?</p> <p>8 A. Owner.</p> <p>9 Q. What are your duties and responsibilities for Constable 10 Kolkman LLC?</p> <p>11 A. To keep an eye on the daily activity.</p> <p>12 Q. Is keep an eye on -- can I call that management?</p> <p>13 A. Yes.</p> <p>14 Q. And what else do you do for Constable Kolkman LLC?</p> <p>15 A. I take care of the books.</p> <p>16 Q. Okay. So you manage.</p> <p>17 A. Payroll.</p> <p>18 Q. Oh sorry, go ahead.</p> <p>19 A. Take care of the books, the payroll.</p> <p>20 Q. Okay. And other than the books and the payroll and 21 managing the daily operations, what else do you do for Constable 22 Kolkman LLC?</p> <p>23 A. I research some of the executions. I go out and observe 24 any property that we may be looking at and have conversations with 25 the employees on where we're going on different writs.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. I service. It's a one-man operation, I do it all.</p> <p>2 Q. Can you give me an example of what you do?</p> <p>3 A. I serve the papers, I bill the papers, I pay the bills.</p> <p>4 Q. And what kind of papers do you serve for that company, 5 for Kolkman Constable Services?</p> <p>6 A. Legal process.</p> <p>7 Q. Okay. And other than serving legal process, handling 8 the bills and that sort of thing, what do you do for Kolkman 9 Constable Services?</p> <p>10 A. That's it.</p> <p>11 Q. Briefly, let's touch on Wasatch Constables.</p> <p>12 You used to work for Wasatch Constables?</p> <p>13 A. Yes.</p> <p>14 Q. Did you own part of Wasatch Constables?</p> <p>15 A. Yes.</p> <p>16 Q. And how much of it did you own?</p> <p>17 A. At one point, 50 percent.</p> <p>18 Q. Okay. 50 percent or 0.5 -- 50 percent, right?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. And who did you own Wasatch Constables with?</p> <p>21 A. Steve Maese.</p> <p>22 Q. Will you spell Maese for the court reporter?</p> <p>23 A. M-A-E-S-E.</p> <p>24 Q. Is he a constable?</p> <p>25 A. No.</p>

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1	Q. Does he still own the company?	1 Q. Okay. And I'm trying to think of the word.
2	A. As far as I know.	2 Would it be authorization or appointment; appointment
3	Q. Do you still own the company?	3 for Ogden City, right?
4	A. No.	4 MR. HILL: Objection to the extent it calls for a legal
5	Q. When did you sell your share of Wasatch Constables?	5 conclusion or for foundation.
6	A. I did not sell it.	6 You can answer the best of your ability.
7	Q. How did you lose 50 percent of the company?	7 Q. Let me stop you there before you answer that.
8	A. I walked away.	8 Do you know whether or not you're appointed or some
9	Q. Why did you walk away from Wasatch Constables?	9 other name for your ability to be a Constable for Ogden City?
10	MR. HILL: Objection. Beyond the scope; therefore, the	10 A. I'm appointed.
11	question is designed to annoy or harass the witness.	11 Q. Okay. You don't need to be a lawyer to know that.
12	You can answer.	12 A. I'm appointed; they're deputized.
13	A. I found that the partner was becoming an extreme	13 Q. Okay. Under your appointment only?
14	liability and we didn't get along.	14 A. Yes.
15	Q. Steve Maese?	15 Q. Okay. How many employees does Constable Kolkman
16	A. Correct.	16 Services have that are not constables or deputies?
17	Q. When did you walk away?	17 A. Five.
18	A. I think it was October 1st, 2019.	18 Q. And how many employees does Constable Kolkman LLC have,
19	Q. So from October 1st 2019 when you walked away from	19 other than you?
20	Wasatch Constables, you then worked for Kolkman Constable	20 A. Run that one past me again.
21	Services.	21 Q. Constable Kolkman LLC, your other company: there's you,
22	Is that right?	22 but then how many employees does that company have?
23	A. Correct.	23 A. Myself and maybe, part-time, one.
24	Q. And that went -- and that's ongoing, right now?	24 Q. Okay. You and one part-time.
25	A. Yes.	25 And who is that part-timer?
	Page 15	Page 17
1	Q. Okay. And then a year ago in January of 2023 you	1 A. Chris Stewart.
2	started a new company, Constable Kolkman LLC.	2 Q. Okay. Let's circle back on Cory Revel, then.
3	A. Correct.	3 Which company does he work for?
4	Q. Okay. How many Constables are employed at Kolkman	4 A. Constable Kolkman.
5	Constable Services?	5 Q. Okay. But you just said there was only one employee
6	A. Constables or deputies?	6 under you, Chris Stewart.
7	Q. Start with Constables.	7 A. For Kolkman Constable Services: I thought that's what
8	A. One.	8 you meant.
9	Q. You?	9 Q. No, I'm more confused now.
10	A. Yes.	10 A. So am I.
11	Q. And how many deputies?	11 Q. So who does Cory work for; which company?
12	A. Two part-time.	12 A. Constable Kolkman.
13	Q. Their names?	13 Q. Constable Kolkman LLC. Okay.
14	A. Chris Stewart [phonetic] and -- I just went blank on	14 Constable Kolkman LLC then has you, Chris Stewart as a
15	him. I'm picturing him.	15 part-time employee, and then Cory Revel also.
16	Q. It's not Cory Revel?	16 A. Yes. And others.
17	A. No. It's Tyler Plowman [phonetic].	17 Q. Oh, others. Who else; how many others?
18	Q. Okay. And they are deputies, meaning that they work	18 A. Probably five.
19	under your supervision?	19 Q. Okay. Are they the same five that work for Kolkman
20	A. Yes.	20 Constable Services?
21	Q. Okay. You're an Ogden City Constable?	21 A. No.
22	A. Correct.	22 Q. Okay. So between the two companies, you've got roughly
23	Q. And Chris Stewart and Tyler Plowman are both deputies	23 10 employees under you?
24	under that same --	24 A. Probably roughly.
25	A. Under me.	25 Q. Do these two companies keep a separate office from each

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1	other?		
2	A. Depends where I'm at.		
3	Q. Do the two companies keep separate bank accounts?		
4	A. Yes.		
5	Q. And do you get separate paychecks from the two companies?		
6	A. I wish I got one from both, but I don't.		
7	Q. Okay. Which company pays you?		
8	A. Constable Kolkman.		
9	Q. And why don't you get paid from Kolkman Constable Services?		
10	MR. HILL: Objection. It's beyond the scope of discovery and disproportionate to the matter in this case, and as a result is only intended to harass or annoy the witness.		
11	I will allow the witness to answer the question, but I'm going to ask the court reporter to designate that portion of the transcript as confidential under the court's standard protective order.		
12	MR. STEPHENSON: I'll object to that.		
13	BY MR. STEPHENSON:		
14	Q. Go ahead and answer.		
15	A. What was the question again?		
16	Q. Why don't you get paid any money from Kolkman Constable Services?		
17	[The following testimony deemed confidential.]		
		Page 19	Page 21
1	A. [REDACTED]		
2	[End of confidential testimony.]		
3	Q. Most of your efforts are spent for Kolkman -- I'm sorry, for Constable Kolkman LLC?		
4	A. Yes.		
5	Q. How many of these 10 employees for these two companies came to you from Wasatch Constables?		
6	A. Two.		
7	Q. Who were those two?		
8	A. Chris Stewart and Tyler Plowman.		
9	Q. How many of -- well, let's go back to it.		
10	How did Constable Kolkman LLC begin; did you buy that company from someone else with a different name, or did you just start it from scratch?		
11	A. Started it from -- which one?		
12	Q. Constable Kolkman LLC, the one you started in January of 2023.		
13	A. I was approached from another individual that had it before and I took it over.		
14	Q. And did you -- that was Michael Erickson [phonetic] that approached you?		
15	A. In a roundabout way.		
16	Q. Go ahead.		
17	A. No, go ahead.		
18	[The following testimony deemed confidential.]		
19	A. [REDACTED]		
20	[End of confidential testimony.]		
21	MR. HILL: I'm going to move to designate or request that the court reporter designate the answer to that question as confidential in the protective order.		
22	MR. STEPHENSON: And I'll object.		
23	BY MR. STEPHENSON:		
24	Q. Okay. And health issues meaning he wanted to stop?		
25	A. Pardon?		
26	Q. Health issues meaning Michael Erickson wanted to stop conducting business altogether, or scale it back?		
27	A. I don't know what he was going to do afterwards.		
28	Q. What specific business did you take over from Michael Erickson?		

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1 [The following testimony deemed confidential.]	1 A. [REDACTED]
2 A. [REDACTED]	2 [End of confidential testimony.]
3 [End of confidential testimony.]	3 MR. HILL: And I'm going to move to designate that
4 Q. And that was why you started?	4 answer of the deposition transcript as confidential.
5 MR. HILL: I'm going to request the answer be designated	5 Q. What factors did you consider when considering whether
6 confidential in the protective order.	6 to take over Michael Erickson's business?
7 MR. STEPHENSON: I'm going to ask you to stop doing	7 A. I needed the work.
8 that, because this is a deposition where I'm entitled to ask	8 Q. The serving papers under Kolkman Constable Services
9 questions freely.	9 wasn't as much as you wanted to have being done?
10 MR. HILL: I'm not objecting to your entitlement to ask	10 A. Yeah.
11 questions, but I have an obligation to designate confidential	11 Q. You saw taking over Michael Erickson's business as a
12 material at the time the answer is provided.	12 growth of your professional business?
13 We'll waive that -- and I'm not willing to waive that	13 A. Yes.
14 designation.	14 Q. Did Michael Erickson tell you how much money to expect
15 MR. STEPHENSON: Okay. Well, there's nothing	15 you would make taking over his business?
16 confidential about why he took over a business or what he took	16 A. Not really.
17 over.	17 Q. What parts of his business did you take from Michael
18 MR. HILL: That is going to be for the judge to decide	18 Erickson?
19 if and when it becomes appropriate. But I'm not going to stop	19 Specifically, let's start with -- you took over his
20 raising the -- or protecting what we're entitled to protect under	20 letters, right -- the letter templates look the same to me.
21 the protective order.	21 Did you get those from Michael Erickson?
22 BY MR. STEPHENSON:	22 [The following testimony deemed confidential.]
23 Q. Okay. So you took over the writ of execution side of	23 A. [REDACTED]
24 Michael Erickson's business, correct?	24 [End of confidential testimony.]
25 A. I believe so, yeah.	25 MR. HILL: I'm going to designate that portion of that
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1 Q. And that means what?	1 answer in the deposition transcript as confidential.
2 Explain exactly what you mean by taking over that writ	2 MR. STEPHENSON: Yeah, we're going to stop doing this.
3 of execution part.	3 That's not confidential. And if you keep doing that on
4 A. We started handling the writ of executions.	4 answers that are not confidential -- let's mark that one, put the
5 Q. Let's make sure we're on the same page here:	5 word purple there.
6 When you say handling the writ of executions, you mean	6 We're going to come back to that, because I'm going to
7 in a different way than you were handling them before January of	7 call a judge if you keep doing that with stuff that's not -- I
8 2023, correct?	8 mean, health issues, even that shouldn't be.
9 A. No.	9 You can take up confidentiality issues later if you
10 Q. Okay. So before January of 2023, when you started this	10 want.
11 new company, your other company was handling writs of execution	11 MR. HILL: But I have to preserve it during the
12 the same way it is now, or the same way the new company is now?	12 deposition.
13 A. It varied on each circumstance.	13 MR. STEPHENSON: Yeah, I know.
14 Q. Okay. Is Constable Kolkman LLC doing anything	14 Let's do this.
15 business-like or business-wise different than Kolkman Constable	15 BY MR. STEPHENSON:
16 Services did before you started the new company?	16 Q. Let me ask you this.
17 A. Each circumstance had a different issue, so no.	17 You took over the letter templates from Michael
18 Q. Okay. So Kolkman Constable Services was collecting	18 Erickson, correct?
19 payments on executions before Constable Kolkman LLC started	19 [The following testimony deemed confidential.]
20 collecting payments on executions?	20 A. [REDACTED]
21 MR. HILL: I'm going to object on the grounds that it's	21 [End of confidential testimony.]
22 beyond the scope and disproportionate. As a result, it's only	22 Q. What else did you take over from Michael Erickson?
23 intended to harass or annoy the witness.	23 MR. HILL: And I'm going to -- same objection.
24 You can answer.	24 MR. STEPHENSON: Same objection.
25 [The following testimony deemed confidential.]	25 Q. What else did you take over from Michael Erickson?

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1 MR. STEPHENSON: But what is confidential about that?
2 MR. HILL: The existence of an identity of its client
3 relationships.
4 BY MR. STEPHENSON:
5 Q. Okay. Mr. Kolkman, when you execute a writ for LeBaron
6 and Jensen, is their name on the writ?
7 A. What do you mean on the writ?
8 Q. Well, you know what a writ of execution looks like, of
9 course.
10 A. I've seen one.
11 Q. Okay. You've seen hundreds, thousands, right?
12 It's not a mystery.
13 A. Okay.
14 Q. Correct?
15 A. Yeah.
16 Q. Okay. And when LeBaron and Jensen gives you a writ of
17 execution to execute, their name is on that writ, correct?
18 A. I just need a little clarification.
19 Are you saying on the writ as a plaintiff or defendant
20 or as the attorneys?
21 Q. Anywhere on the writ.
22 A. It is on the writ.
23 Q. Okay. So the fact that LeBaron and Jensen is your
24 client is not a secret at all, is it?
25 MR. HILL: Objection. Misstates his testimony.

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1 And so yes, we believe that that is not relevant. And
2 as a result of being disproportionate, it's only purpose is to
3 annoy or harass the witness.
4 That is the subject of ongoing meet and confers and
5 disputes over the scope of what is permitted in discovery.
6 We've seen no contrary authority from you to that point.
7 And I am preserving that objection in this deposition
8 transcript.
9 MR. STEPHENSON: You haven't clarified your objection.
10 What -- forget your objection.
11 BY MR. STEPHENSON:
12 Q. When you execute a writ of execution, in general --
13 let's start from the very beginning.
14 We want to be here all day, apparently.
15 When you execute a writ of execution, what -- you go to
16 the door with paperwork in your hand, correct?
17 A. Yeah.
18 Q. And that paperwork has -- one of the documents is a writ
19 of execution, correct?
20 A. Correct.
21 Q. And the attorney who issued -- or who obtained that writ
22 from the court is noted on the writ of execution, correct?
23 A. Yes.
24 Q. And sometimes that attorney's name is Mountain Land
25 Collections, sometimes it's Cherrington, sometimes it's Olson

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1 And you can answer -- well, you can answer the best of
2 your understanding.
3 A. I'm trying to think here, and I'm not trying to be
4 deceitful.
5 Just to make it simpler, yeah.
6 Q. Okay. And is there --
7 Okay. When you execute a writ of execution, you hand
8 papers to a person who is subject to that writ, correct?
9 MR. HILL: I'm going to object again that this is beyond
10 the scope of relevance or proportionality in this action and is
11 therefore only intended to annoy or harass the witness.
12 You can answer the best of your understanding.
13 MR. STEPHENSON: Hang on.
14 You really want to say that I'm asking an irrelevant
15 question and harassing the witness by asking him how he executes a
16 writ of execution; is that your objection?
17 MR. HILL: How he -- as you well know, this has been the
18 subject of meet and confer discussions in other discovery disputes
19 in this case and other cases.
20 Mr. Kolkman's conduct with respect to other -- how he
21 handles the service of other documents in other cases unrelated to
22 this case is established in other jurisdictions as not within the
23 scope of relevance of this action.
24 We've seen no authority from you countering those
25 positions.

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1 Shamer, sometimes it's LeBaron and Jensen; correct?
2 MR. HILL: I'm going to object again that getting into
3 the details of specific --
4 I'm going to raise the objection which is beyond the
5 scope of discovery and disproportionate, and as a result intended
6 to harass and annoy the witness.
7 You can answer to the best of your understanding.
8 A. What's your question again?
9 Q. Will you read the question back, please?
10 Q. And sometimes that attorney's name is Mountain Land
11 Collections, sometimes it's Cherrington, sometimes it's Olson
12 Shamer, sometimes it's LeBaron and Jensen; correct?"
13 A. Sometimes, yes.
14 Q. And those writs of execution are public documents,
15 correct?
16 A. Correct.
17 Q. So the fact that you have those clients or any specific
18 client at all is not confidential in any way, shape or form, is
19 it?
20 MR. HILL: Objection, calls for legal conclusion.
21 Q. You can answer, it's okay.
22 A. Not to my knowledge.
23 MR. STEPHENSON: Let's go off the record real quick.
24 [Off the record at 10:49 a.m.]
25 [Back on record at 10:51 a.m.]

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<p style="text-align: right;">Page 34</p> <p>1 BY MR. STEPHENSON:</p> <p>2 Q. Okay. Let's talk about Constable Kolkman LLC, the new 3 company.</p> <p>4 You said its job is to serve writs of execution; is that 5 right?</p> <p>6 A. Yeah.</p> <p>7 Q. Does that company serve any other documents?</p> <p>8 A. Not to my knowledge.</p> <p>9 Q. Kolkman Constable Services, the old company: is that the 10 one that serves garnishments, writs of restitution, subpoenas, 11 summons and complaints?</p> <p>12 A. Correct.</p> <p>13 Q. Did you ever get a legal opinion from an attorney prior 14 to starting this new company?</p> <p>15 A. No.</p> <p>16 Q. Did Michael Erickson provide you anything from an 17 attorney saying it's legal to run your company the way you are 18 running it?</p> <p>19 A. No.</p> <p>20 Q. How many writs of execution does Constable Kolkman LLC 21 serve in a given week?</p> <p>22 A. Kolkman Constable Services?</p> <p>23 Q. The new company, Constable Kolkman LLC.</p> <p>24 A. How many do we serve in a week?</p> <p>25 Q. Yeah.</p>	<p style="text-align: right;">Page 36</p> <p>1 service of process or a writ of execution?</p> <p>2 MR. HILL: Objection, calls for a legal conclusion.</p> <p>3 Q. You can answer, it's okay.</p> <p>4 A. When we mail one to an individual, it is because they've 5 called our office from a letter or notice.</p> <p>6 We let them know what we have and what it's about and if 7 they are all right with receiving it by mail.</p> <p>8 Q. You only mail writs of execution when the person, the 9 defendant, tells you it's okay to mail it?</p> <p>10 A. Correct.</p> <p>11 Q. Is looking in people's windows and pounding on their 12 doors and looking in their car windows part of serving these writs 13 of execution?</p> <p>14 MR. HILL: I'm going to object to that as irrelevant, 15 beyond the scope of discovery, disproportionate to the issues in 16 this case, only intended to harass or annoy the witness.</p> <p>17 A. As far as I know, we don't do that.</p> <p>18 Q. Okay. You don't look in people's windows when you serve 19 papers?</p> <p>20 MR. HILL: Objection. Same objection: intended to annoy 21 harass.</p> <p>22 A. Yes, if we're walking up the sidewalk and the windows 23 are right there, yeah, we would look in there.</p> <p>24 Q. You don't go out, step onto the grass or into a planter 25 bed and look with your face up against a window?</p>
<p style="text-align: right;">Page 35</p> <p>1 A. Oh, anywhere from 20-plus.</p> <p>2 Q. And those are served how?</p> <p>3 A. By service: by either being served to the plaintiff or 4 by a letter.</p> <p>5 Q. And what do you mean served to the plaintiff?</p> <p>6 A. Pardon?</p> <p>7 Q. What do you mean by being served to the plaintiff?</p> <p>8 A. When we actually -- not to the plaintiff, but to the 9 defendant.</p> <p>10 A. Okay. So that was a mistake when you said plaintiff; 11 you meant defendant, right?</p> <p>12 A. Oh, yeah. Sorry.</p> <p>13 Q. No big deal. It just confused me. And the echo doesn't 14 help, honestly.</p> <p>15 A. No.</p> <p>16 Q. Okay. So some of these, you serve by mail?</p> <p>17 A. We have, yes.</p> <p>18 Q. And some you serve by personally handing them to the 19 defendant?</p> <p>20 A. Or someone who resides there by the legal definition of 21 getting a paper served.</p> <p>22 Q. And how many of that 20-plus writs of execution that you 23 serve weekly are by mail compared to in person?</p> <p>24 A. The majority is by person.</p> <p>25 Q. And is mailing the writ of execution considered proper</p>	<p style="text-align: right;">Page 37</p> <p>1 MR. HILL: Same objection: annoy/harass.</p> <p>2 A. No.</p> <p>3 Q. And why wouldn't you do that; why wouldn't you want to 4 see who's home?</p> <p>5 MR. HILL: Objection, intended to annoy/harass the 6 witness.</p> <p>7 MR. STEPHENSON: You're obstructing my deposition, by 8 the way.</p> <p>9 And we are going to put an end of this in a little 10 while, and then I'm going to go after fees and costs.</p> <p>11 MR. HILL: We're about ready to put a termination to 12 this to seek a protective order.</p> <p>13 MR. STEPHENSON: Really?</p> <p>14 MR. HILL: So we're fine with this being --</p> <p>15 MR. STEPHENSON: Oh, I would love that. That would be 16 much better.</p> <p>17 Why don't you do this: why don't you go ahead and answer 18 that question.</p> <p>19 And then let's give him a break to cool down because 20 he's shaking right now.</p> <p>21 MR. HILL: I am fine.</p> <p>22 BY MR. STEPHENSON:</p> <p>23 Q. Why don't you go ahead and answer the question: why is 24 it that you don't --</p> <p>25 MR. HILL: I object to the mischaracterization of my</p>

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<p>1 behavior on the record.</p> <p>2 You are welcome to answer the question.</p> <p>3 Q. Please answer the question: why don't you look through</p> <p>4 windows and put your face up against windows to see who's inside?</p> <p>5 MR. HILL: Subject to the same objection.</p> <p>6 A. I personally do not do that.</p> <p>7 Q. Right, but why?</p> <p>8 A. I would glance as I'm walking by to see what there is in</p> <p>9 there, as far as if there's a threat to me. But to do that as a</p> <p>10 peeping tom, I do not condone that and I have never done that.</p> <p>11 Q. And why?</p> <p>12 MR. HILL: Same objection: annoy and harass.</p> <p>13 A. It's just not ethical.</p> <p>14 MR. HILL: I think this would be a good time to take a</p> <p>15 break, as you had suggested, as I would like to confer with my</p> <p>16 client.</p> <p>17 MR. STEPHENSON: He's still under oath. So go ahead,</p> <p>18 and I'll ask him questions about it.</p> <p>19 MR. HILL: Understood.</p> <p>20 [Off the record at 10:57 a.m.]</p> <p>21 [Back on record at 11:05 a.m.]</p> <p>22 MR. HILL: In light of the last question that was</p> <p>23 answered and the repeated history of questions that have been</p> <p>24 objected to in this deposition, we are going to suspend and</p> <p>25 terminate this deposition for the purpose under Rule 30(b) --</p>	<p>Page 38</p> <p>1 MR. HILL: You can -- I'm not interrupting you.</p> <p>2 MR. STEPHENSON: Okay. You look like you are, the way</p> <p>3 you're talking in the air.</p> <p>4 MR. HILL: Again, I object to his mischaracterization of</p> <p>5 my behavior.</p> <p>6 I said nothing while he was in the process of finishing</p> <p>7 his question and your statement, and you're entitled to continue</p> <p>8 doing so.</p> <p>9 MR. STEPHENSON: Your head was bobbing and your mouth</p> <p>10 was opening and closing like you were speaking.</p> <p>11 So let me be sure I understand this: even though I have</p> <p>12 other questions that I could ask, -- and you haven't heard those</p> <p>13 questions yet -- it's your -- you think that those questions are</p> <p>14 all going to be irrelevant, and that's why you want to terminate?</p> <p>15 MR. HILL: Eric, you know as well as I do that I don't</p> <p>16 know what your questions are. But the questions you've asked thus</p> <p>17 far and continue to ask are objectionable and harassing.</p> <p>18 And we're entitled to suspend the deposition under Rule</p> <p>19 30(d)(3) to get a ruling on that before we continue. And that is</p> <p>20 what we are doing.</p> <p>21 Thank you for describing your position, but we will --</p> <p>22 yes, that that's the process of suspending a deposition under Rule</p> <p>23 30(d)(3) is you don't get to the end of it and then suspend it.</p> <p>24 MR. STEPHENSON: I'm trying to meet and confer. I'm</p> <p>25 trying to discuss this with you so we can avoid that if we can.</p>
<p>Page 39</p> <p>1 sorry, 30(c) -- sorry, under Rule 30(d)(3), to terminate the</p> <p>2 deposition for the purpose of seeking a protective order.</p> <p>3 MR. STEPHENSON: And the protective order is based on</p> <p>4 what?</p> <p>5 MR. HILL: Well, on the continuing annoyance and</p> <p>6 harassment of the witness by asking questions that are beyond the</p> <p>7 scope of discovery and outside the scope of proportionality for</p> <p>8 this case and the inability to get resolution on that dispute.</p> <p>9 MR. STEPHENSON: Can you give me an example?</p> <p>10 MR. HILL: Eric, we will be bringing our motion for</p> <p>11 protective order.</p> <p>12 We've already met and conferred on the record about your</p> <p>13 challenging the objections and protective order requests that I've</p> <p>14 made.</p> <p>15 I think you have your examples. We've met and conferred</p> <p>16 and you already indicated that.</p> <p>17 The other examples will be indicated in our motion for</p> <p>18 protective order.</p> <p>19 And we'd ask for an expedited copy of the transcript</p> <p>20 thus far.</p> <p>21 MR. STEPHENSON: Well, I'd like to have some</p> <p>22 conversation with you before you just terminate this. Because</p> <p>23 we've obviously got a lot of questions and I've traveled a long</p> <p>24 way and expended a lot of -- you're not going to let me finish my</p> <p>25 sentence?</p>	<p>Page 41</p> <p>1 Are you open to avoiding that suspension and letting me</p> <p>2 continue?</p> <p>3 We do have a judge that I've called twice now.</p> <p>4 MR. HILL: I understand.</p> <p>5 MR. STEPHENSON: And we could wait for that.</p> <p>6 MR. HILL: Well, we don't have to sit here -- we don't</p> <p>7 know if the judge is going to get back to us today or not. We</p> <p>8 don't have to sit here indefinitely.</p> <p>9 And based on the questions you've continued to ask in</p> <p>10 the face of the ongoing objections, yes, I believe you are in a</p> <p>11 line of questioning that will continue to be objectionable and</p> <p>12 there is no purpose.</p> <p>13 I think the intent is to get the judge's ruling on the</p> <p>14 nature of the harassment and annoyance and the scope of a</p> <p>15 protective order before we continue.</p> <p>16 I do agree with -- I do -- I maintain that position.</p> <p>17 MR. STEPHENSON: Help me understand the scope of your</p> <p>18 protective order, then.</p> <p>19 What are you asking for specifically; how am I --</p> <p>20 No, because this is part of our meet and confer.</p> <p>21 If I can limit my question -- let me finish before you</p> <p>22 interrupt.</p> <p>23 MR. HILL: I had not started --</p> <p>24 MR. STEPHENSON: If I could finish -- you've got this</p> <p>25 this incredible effect to you that you don't want to let me</p>

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1 finish.	1 And that's what we're dealing with here.
2 But if I can ask questions, if you can help me ask	2 Yes, we have not instructed the witness not to answer
3 questions -- tell me how I can ask a question that is satisfactory	3 any questions thus far.
4 to you that is not going to harass your client.	4 We've preserved objections. And notwithstanding the
5 He doesn't seem harassed to me.	5 preserving of those objections, you are continuing to ask
6 MR. HILL: Eric. We had, now in the first hour, at	6 questions that are outside of what is relevant to this matter,
7 least a dozen questions, if not more, where you're asking	7 beyond the scope of discovery. And at some point, that becomes
8 questions about matters that do not pertain to this action.	8 annoying and harassing.
9 I've articulated that the grounds for why they are	9 And so no, I don't know how to instruct you what
10 annoying and harassing, already in connection with the objections,	10 questions to ask that would not be offensive. I don't know what
11 you don't seem to want to learn or change your pattern of behavior	11 your questions are that you have lined up other than those that
12 in light of those objections because you continue to ask ongoing	12 relate to the issues in the pleading, the complaint, the matters
13 questions in the same vein as the prior objections.	13 in the causes of action alleged in this action.
14 So no, I don't see any value to continuing and allowing	14 And you've gone well beyond that. And we've preserved
15 you to --	15 our objections.
16 You've already established an unwillingness to change	16 You don't believe you're going beyond that; we'll bring
17 your behavior in the face of already existing objections.	17 our motion for protective order.
18 And rather than meet and confer, you called the judge	18 MR. STEPHENSON: Okay. If there's nothing I can do to
19 looking for direction which we haven't gotten an answer from.	19 meet and confer with you and satisfy you.
20 We're going to go to the judge and get the same	20 MR. HILL: We've met and conferred. Don't --
21 direction that you're seeking in the purpose of the voicemail that	21 MR. STEPHENSON: I understand that.
22 you left the judge.	22 MR. HILL: Don't put in this deposition that we're
23 MR. STEPHENSON: Well, I'm willing to change my behavior	23 unwilling to meet and confer, because that's not true.
24 so I will stop offending you.	24 MR. STEPHENSON: We're conferring now; you've fully
25 What I'd like to do is be able to ask questions and not	25 satisfied that.
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1 have a relevancy objection, because that's not a proper objection.	1 My concern is that I'm not sure how I've been unable to
2 And you've made it enough times that it's not proper	2 satisfy you. Because I'm ready to proceed, I've paid a fortune to
3 Confidentiality: you don't have to make that during.	3 be here, I spent my time to be here.
4 You can if you want, but you don't have to. You can actually make	4 And that's the perfect smile to show how much -- your
5 that later on. And under the standard protective order, that's	5 contempt for me and why this is -- you're interfering with my
6 totally fine.	6 ability to take this deposition with your questions.
7 But I'm not harassing the witness by asking him	7 And I'm going to ask for sanctions for the way you've
8 questions about his business conduct, what he does, and how he	8 interfered so far.
9 does it. That's totally within the scope of this --	9 But now you're actually terminating, and I am going to
10 First of all, it doesn't matter if it's relevant or not:	10 ask for sanctions on that.
11 I can ask him what he likes for breakfast, and he would have to	11 And I know you're not concerned about that and nobody
12 answer. You know that.	12 cares, but I do. I have a job to do.
13 But I'm not asking him questions that are irrelevant.	13 He's willing to answer my questions. He's been
14 What I'm asking him for is questions that pertain	14 extremely cooperative.
15 directly to how he conducts business and what that business is.	15 It's just you that hasn't been.
16 MR. HILL: And I'm going to object to your	16 MR. HILL: I object to that characterization.
17 characterization that you are trying to ask questions that don't	17 MR. STEPHENSON: Of course, you do.
18 offend me.	18 MR. HILL: Again, this is not personal between the
19 Nothing about this is about my offense; this is about	19 attorneys, and you're making it personal between the attorneys.
20 your treatment of the witness, my client, that I am protecting.	20 MR. STEPHENSON: Not at all.
21 Yes, you can ask him questions about what he had for	21 MR. HILL: I am protecting my client's interest.
22 breakfast. And yes, he has to answer.	22 I think we've said enough on the record. I don't have
23 That does not make that question insulated from being an	23 anything further to say.
24 annoyance or harassment when it's beyond the scope of the	24 We'll see you in the briefing on the protective order.
25 discovery.	25 MR. STEPHENSON: Okay. I guess that's all we can do.

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1 [Adjourned at 11:14 a.m.] 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	<p style="text-align: right;">Page 46</p> <p>1 2 STATE OF UTAH) 3 COUNTY OF UTAH) 4 I, Spencer Von Jarrett, a Certified Shorthand Reporter, 5 Registered Professional Reporter, hereby certify: 6 THAT the foregoing proceedings were taken before me at 7 the time and place set forth in the caption hereof; that the 8 witness was placed under oath to tell the truth, the whole truth, 9 and nothing but the truth; that the proceedings were taken down by 10 me in shorthand and thereafter my notes were transcribed through 11 computer-aided transcription; and the foregoing transcript 12 constitutes a full, true, and accurate record of such testimony 13 adduced and oral proceedings had, and of the whole thereof. 14 I have subscribed my name on this 22nd day of April, 15 2024. 16 17 Spencer Von Jarrett 18 Registered Professional Reporter #993793 19 20 21 22 23 24 25</p> <p style="text-align: right;">S. J.</p> <hr/> <p style="text-align: center;">Page 47</p> <table border="1" style="width: 100%; border-collapse: collapse;"><thead><tr><th style="text-align: left; padding: 2px;">1</th><th colspan="2" style="text-align: center; padding: 2px;">CERTIFICATE OF DEPONENT</th></tr><tr><th style="text-align: left; padding: 2px;">2</th><th style="text-align: left; padding: 2px;">PAGE</th><th style="text-align: left; padding: 2px;">LINE</th><th style="text-align: left; padding: 2px;">CHANGE</th></tr></thead><tbody><tr><td style="text-align: left; padding: 2px;">3</td><td style="text-align: left; padding: 2px;"></td><td style="text-align: left; padding: 2px;"></td><td style="text-align: left; padding: 2px;"></td></tr><tr><td style="text-align: left; padding: 2px;">4</td><td style="text-align: left; padding: 2px"></td><td style="text-align: left; padding: 2px"></td><td style="text-align: left; padding: 2px"></td></tr><tr><td style="text-align: left; padding: 2px;">5</td><td style="text-align: left; 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18	I, Rob Kolkman, deponent herein, do hereby certify and declare under penalty of perjury the within and foregoing transcription to be my deposition in said action; that I have read, corrected, and do hereby affix my signature to said deposition.																																																																																																			
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